



**Environmental  
Protection Agency**

John R. Kasich, **Governor**  
Mike DeWine, **Lt. Governor**  
Scott J. Walz, **Director**

Reference No. 43  
Valley Pike VOCs  
EPA ID No. OHN000510489

June 6, 2012

William R. Mullins, Jr.  
Mullins Rubber Products, Inc.  
2949 Valley Street  
Riverside, Ohio 45424-2693

Dear Mr. Mullins:

Ohio EPA's Underground Injection Control (UIC) Section received a letter dated May 2, 2012 from Timothy Hoffman of Dinsmore & Shohl LLP regarding the proposed recirculating chiller that would eliminate Mullins Rubber Products' (Mullins) need for injection wells to discharge non-contact cooling water. The letter indicated that Mullins' should know if their application for a grant to pay for installation of the chiller system in July was successful around the end of May, 2012.

If Mullins is proceeding with the installation of the chillers and abandonment of the injection wells this July, then Ohio EPA agrees that sampling and analysis of the injectate is not necessary. However if the injection of cooling water is to continue into the foreseeable future then in order to determine compliance with OAC Rule 3745-34-07, Mullins must per OAC Rule 3745-34-11(N) provide an analysis of the non-contact cooling water immediately prior to the non-contact cooling water entering the injection wells. Analysis results of water have been obtained from the injection wells, but these samples are probably a mixture of the non-contact cooling water and ground water. In order to demonstrate compliance with OAC Rule 3745-34-07(A), a sample of the non-contact cooling water from a location just prior to injection into the wells must be obtained and analyzed. The attached table lists the constituents that the samples of the non-contact cooling water must be analyzed per approved drinking water methods with method detection limits that are below the maximum contaminant level (MCL) for each constituent.

Please indicate within 30 days if Mullins is installing a chiller unit and abandoning the injection wells in July or if Mullins will submitting analysis results of the injectate. Any analysis results must be submitted within 45 days of receiving this letter.

If you have any questions concerning this letter, please contact me or Val Orr at (614) 644-2752.

Sincerely,

Lindsay Taliaferro III  
UIC Program Manager  
Division of Drinking and Ground Waters

cc: Val Orr, DDAGW-UIC  
Jess Stottsberry, Geologist, DDAGW  
Timothy D. Hoffman  
Mike Proffitt, DDAGW-SWDO

1

**Table 1**  
**Constituents to Be Analyzed in Effluent Waste Water**

<b>Metals</b>	<b>Volatile Organic Compounds (VOCs)</b>
Antimony	Vinyl Chloride
Arsenic	Benzene
Barium	Carbon tetrachloride
Beryllium	p-Dichlorobenzene
Cadmium	1,2-Dichloroethane
Chromium	1,1-Dichloroethylene
Cyanide (as free cyanide)	Trichloroethylene
Fluoride	1,1,1-Trichloroethane
Mercury	o-Dichlorobenzene
Selenium	cis-1,2-Dichloroethylene
Thallium	trans-1,2-Dichloroethylene
	1,2-Dichloropropane
	Dichloromethane
	Ethylbenzene
	Monochlorobenzene
	Styrene
	Tetrachloroethylene
	Toluene
	1,2,4-Trichlorobenzene
	1,1,2-Trichloroethane
	Xylenes (total)